

DATE	TIME	BY	DESCRIPTION
08/16/04	7.10	MFK	review Andritz's motion for temporary injunction and attached exhibits; review consent decree, contract between Andritz and GMP, and contract between Syangro and Andritz for supporting provisions in preparation of drafting complaint; draft complaint against GMP - introduction, jurisdiction, venue, factual statement, causes of action, relief, damages, and accompanying summons; review and revise draft of complaint; meeting and email with P. Alston re same and complaint issues
08/17/04	0.50	PA	work on complaint
08/17/04	2.80	MFK	meeting with P. Alston re [REDACTED], and P. Alston's comments; compile exhibits to complaint; review and revise complaint draft; email to A. Thomas re [REDACTED]; misc work re summons and filing and service of complaint
08/18/04	0.40	PA	finalize complaint
08/18/04	0.30	MFK	draft cover sheet to district court re complaint filing and summons; review and revise sheet; misc work re filing of complaint and service to GMP
08/25/04	0.10	PA	review transmittal to sheriff re service of complaint; review return of service re complaint served on GMP (NO CHARGE)
08/31/04	0.10	PA	review Declaration of F. Doyle; Exhibits "A" and "B" and Declaration of J. Carmichael to A. Thomas (NO CHARGE)
09/03/04	0.20	PA	receipt and review Defendant GMP Hawaii, Inc.'s answer to complaint filed August 2, 2004
09/10/04	0.20	MFK	review GMP's answer and counterclaim; review FRCP re reply to counterclaim deadline
09/14/04	0.30	PA	email from A. Thomas; telephone call to A. Thomas re

DATE	TIME	BY	DESCRIPTION
			strategy for responding to counterclaim and GMP's response to Andritz
09/18/04	2.20	MFK	review GMP's counterclaim in preparation of drafting reply; draft reply to counterclaim and defenses
09/19/04	0.50	PA	review and revise answer to counterclaim
09/20/04	0.20	PA	email from and to M. Kuo re reply to counterclaim
09/22/04	0.50	PA	email to and from A. Thomas re [REDACTED]; review and finalize reply ro counterclaim
09/22/04	0.40	MFK	review and revise reply to counterclaim to final for filing
09/23/04	0.10	PA	review email from M. Kuo re comments to complaint
11/06/04	1.70	MFK	draft scheduling conference statement; review and revise statement; emails to and from P. Alston on same
11/07/04	0.20	PA	email from and to M. Kuo; review and revise scheduling conference statement
11/08/04	0.20	MFK	finalize and prepare filing of scheduling conference statement
11/17/04	0.20	PA	review rule 16 scheduling order
11/22/04	0.20	DKK	review scheduling conference order; catalog trial date
11/30/04	2.10	JB	work on preparing case, substantive pleadings, and discovery binders; work on updating substantive pleadings binder
03/03/05	0.20	PA	revise concise statement; email to and from M. Kuo

DATE	TIME	BY	DESCRIPTION
03/03/05	5.30	MFK	review Rule 56 re concise statement of facts and draft concise statement of facts; review and revise concise statement; review pleading files to compile relevant exhibits supporting material facts for concise statement
03/04/05	4.80	MFK	finalize concise statement of facts and compile exhibits and highlight relevant language for concise statement; review and revise declaration in support of concise statement of facts; calls with and letter to R. Sutton on same; meeting with P. Alston on [REDACTED]; emails to and from J. Carmichael and J. Hecht re [REDACTED]
03/16/05	0.10	PA	review minute order re continuance of settlement conference
03/17/05	0.10	PA	review concise statement filed by GMP
04/01/05	0.10	PA	review amended rule 16 scheduling order
05/09/05	0.50	MFK	calls to and with B. Bordner, T. Cook, E. Lee, and V. Devens re stipulation for appearance of C. Benedict (0.2); revise stipulation to final to include E. Lee and review and revise to final for execution and email to counsel of record regarding stipulation and execution (0.3)
05/12/05	0.90	DKK	work on settlement conference statement
05/18/05	0.20	MFK	review federal and district court rules re submission of confidential settlement statements and required content
05/23/05	0.20	MFK	draft settlement offer letter to Sutton; review and revise to final
05/24/05	0.90	MFK	draft partial factual background for settlement conference statement; calls (three) with Court re Judge's request to postpone settlement conference

DATE	TIME	BY	DESCRIPTION
06/02/05	0.20	PA	review pleadings
06/16/05	0.10	PA	review minute order re continuance of settlement conference
07/17/05	0.20	DKK	research re confidential settlement conference statement; compose email to M. Kuo & P. Alston re same
07/25/05	0.30	PA	email from and to M. Kuo re settlement conference statement; review and revise draft
07/25/05	6.70	MFK	draft confidential settlement conference statement, including [REDACTED]
07/26/05	2.00	MFK	emails from P. Alston and J. Carmicheal re [REDACTED]; revise draft to incorporate J. Carmicheal edit; review and revise draft with P. Alston's comments to final for filing; review pleading files and correspondence files to compile exhibits to settlement conference statement; identify and highlight relevant pages and materials in exhibits for settlement conference statement
07/26/05	0.00	DKK	work on exhibits for settlement conference statement (NO CHARGE)
07/27/05	0.60	MFK	email from A. Thomas re [REDACTED]; emails to and from J. Carmicheal re [REDACTED]; review GMP for spreadsheet ; miscellaneous work re submission of settlement conference statement and exhibits
09/06/05	0.30	MFK	review letter from Sutton re settlement conference rescheduling; email from Debbie (Sutton's secretary on same); miscellaneous work re coordinating potential settlement conference dates
09/29/05	0.30	MFK	review calender and federal rules re settlement conference statements and deadlines for upcoming settlement conference

DATE	TIME	BY	DESCRIPTION
10/04/05	0.20	PA	email from and to M. Kuo re settlement offer; review and revise letter
10/04/05	1.30	MFK	draft settlement offer letter to Sutton; emails with P. Alston on settlement offer and revise offer to incorporate P. Alston's edits; review letter to final
10/06/05	1.40	MFK	draft and expand facts, defenses, deposition summaries, and settlement update for first amended settlement conference statement; review and revise draft of same; email to P. Alston on same
10/07/05	0.20	PA	review and revise first amended confidential settlement conference statement; email from and to M. Kuo
10/07/05	2.20	MFK	review deposition of Wagdy Guirguis for [REDACTED]; expand and finalize confidential settlement conference statement for submission to Court; compile and highlight relevant portions of exhibits and deposition testimony in support of statement
10/11/05	0.10	PA	review court minutes re trial re-setting conference
12/02/05	5.80	MFK	review GMP's opposition to concise statement and exhibits; draft opposition to concise statement and opposing facts; review declarations, depositions, and GMP's exhibits to concise statement re timelines and conflicting facts to counter sources and statements in concise statement of facts; complied and highlight relevant text of additional exhibits in support of concise statement; meeting with P. Alston on opposition to concise statement; revise and shorten concise statement to incorporate P. Alston's comments and character limitations under rule; miscellaneous work re filing of reply and opposition to concise statement; draft and revise declaration in support of opposition to concise statement
12/04/05	0.30	MFK	review civil rules re page limitations, authorities and content, and word certification; email to A. Matsuo re

DATE	TIME	BY	DESCRIPTION
			errata and draft text for same
02/20/06	0.10	PA	review and revise supplemental settlement conference statement
02/20/06	2.00	MFK	draft supplemental confidential settlement conference statement; review and revise same; identify supporting exhibits on same
02/21/06	0.70	MFK	emails with N. Kanada re settlement conference statement and exhibits; finalize settlement conference statement for submission to court and review compiled exhibits to verify supporting exhibits to statement; emails with P. Alston re confidential settlement conference statement and comments re communications with GMP on settlement offer
02/21/06	0.80	NMK	prepare confidential settlement conference statement; research and compile exhibits to confidential settlement conference statement
03/03/06	0.20	PA	email from and to M. Kuo re [REDACTED]
03/09/06	0.20	PA	telephone call from M. Marsh and T. Pettit re settlement and follow up; email from and to M. Kuo

C. INTERROGATORIES, DOCUMENT PRODUCTION, AND OTHER WRITTEN DISCOVERY

DATE	TIME	BY	DESCRIPTION
11/05/04	2.90	MFK	draft initial disclosures - review pleading files, correspondence, and documents in case file for purposes of clarifying information, claims, and nature of documents for initial disclosures; meeting with P. Alston on same; revise and finalize initial disclosures for filing
11/16/04	0.30	DKK	work on case/substantive trial notebooks
11/17/04	0.30	DKK	work on case, substantive discovery trial notebooks

DATE	TIME	BY	DESCRIPTION
02/18/05	4.40	MFK	review [REDACTED]
02/22/05	0.30	PA	email from and to M. Kuo re [REDACTED]
02/23/05	0.60	MFK	emails to and from P. Alston re proposed discovery; amend proposed discovery email to incorporate P. Alston's comments and email discovery plan to A. Thomas; email to D. Kakazu re preparation of discovery requests templates and proposed discovery requests to be incorporated
02/23/05	1.80	DKK	work on drafting our 1st request for admissions, interrogatories and production of documents to GMP Hawaii, Inc.
02/24/05	0.10	PA	email from and to A. Thomas re [REDACTED]
02/24/05	0.70	MFK	review case timelines and deadlines and draft email to P. Alston summarizing key deadlines related to discovery and relevance of discovery of pending deadlines
02/24/05	0.10	DKK	confer with M. Kuo re [REDACTED]
03/05/05	0.20	PA	email regarding discovery and disclosure obligations
03/09/05	0.10	DKK	emails back & forth with M. Kuo and P. Alston re [REDACTED]
03/10/05	0.10	PA	email to A. Thomas re [REDACTED]; email re disclosure of experts; review motion documents
03/10/05	0.90	DKK	work on expert disclosure
03/11/05	0.00	PA	email from A. Thomas re [REDACTED]; email to M.

DATE	TIME	BY	DESCRIPTION
			Kuo (NO CHARGE)
03/16/05	0.20	PA	telephone calls from and to auditor re disclosures
03/21/05	0.20	PA	work on discovery
03/22/05	0.20	PA	review request for production of documents
03/23/05	2.30	MFK	review GMP's request for production of documents; draft Synagro's first request for production of documents, including instruction and definitions, to GMP; review and revise draft of production request
03/23/05	0.20	DKK	emails back & forth with A. Matsuo & M. Kuo re [REDACTED]
03/24/05	0.00	PA	review and revise notice of taking 30(b)(6) deposition re GMP Hawaii (NO CHARGE)
03/24/05	1.90	MFK	review and revise to final request for production of documents for filing; draft 30(b)(6) deposition notice, including instructions, definitions, and exhibit A on deposition subjects; review and revise deposition notice
03/28/05	0.30	MFK	finalize 30(b)(6) deposition notice for service; call with P. Alston re deposition date
03/29/05	0.10	DKK	work on drafting our response to GMP's 1st request for production of documents
03/31/05	0.20	MFK	calls to and from J. Carmicheal on [REDACTED]
04/05/05	0.10	MFK	call from J. Carmicheal re responsive document and meeting to discuss documents requiring redaction
04/06/05	1.10	DKK	work on objections to GMP's 1st request for production of documents

DATE	TIME	BY	DESCRIPTION
04/12/05	0.10	MFK	email and call from J. Carmicheal re [REDACTED]; email to D. Kakazu on production of same
04/12/05	0.00	DKK	coordinate client's documents for production in response to discovery requests (NO CHARGE)
04/13/05	2.00	MFK	review scope of GMP's request for production; review draft from D. Kakazu of Synagro's response to GMP's production of documents; revise preliminary statement and general objections; review and expand objections for each request and draft responses for document requests; email to D. Kakazu re [REDACTED]
04/13/05	0.40	DKK	work on document production
04/14/05	5.20	MFK	review and revise Synagro's responses to final draft and [REDACTED]; review pleading and correspondence files to identify documents and correspondence responsive to GMP's request for production and documents related to Synagro's initial disclosures; review documents produced by Synagro (documents from Kirk Lucas and Alvin Thomas) in response to GMP's production request and identify responsive and privileged documents
04/15/05	0.20	PA	email from and to M. Kuo re [REDACTED]; review responses
04/15/05	3.00	MFK	emails to and from P. Alston on [REDACTED]; finalize responses for service to GMP; continue review of document from Synagro (main documents) for [REDACTED]; organize responsive documents to correspond to GMP's requests; call to J. Carmicheal (left message) re [REDACTED]
04/15/05	0.50	DKK	work on reviewing documents for production
04/16/05	0.70	MFK	review and organize documents in production for redaction and assertion of privilege and identify relevant privileges for log; chronologically organize responsive

DATE	TIME	BY	DESCRIPTION
			document for production and to identify duplicates; email to P. Alston on documents for production and questions on specific documents regarding responsiveness and privilege
04/17/05	2.10	PA	review and respond to email from M. Kuo re document production; review documents from client
04/18/05	0.20	PA	email from and to M. Kuo re client's documents
04/18/05	0.80	MFK	emails to and from P. Alston on [REDACTED]; meeting with P. Alston on [REDACTED]; incorporate duplicate documents into respective production folders
04/18/05	0.90	DKK	work on client's documents for production
04/18/05	0.50	JB	work on processing client documents for document notation
04/19/05	1.40	MFK	compare drafts of memorandum of understanding regarding sand island and honouliuli projects to final version; calls (two) with J. Carmicheal re [REDACTED]; draft email to J. Carmicheal [REDACTED]; meeting with P. Alston on [REDACTED]
04/19/05	0.40	DKK	work on client' documents for production; confer with M. Kuo re same
04/20/05	1.10	MFK	emails to and from J. Carmicheal re [REDACTED]; meeting with P. Alston on [REDACTED]; review responsive and privileged documents to [REDACTED]
04/21/05	0.40	MFK	calls (two) with J. Carmicheal on [REDACTED]; email to D. Kakazu re [REDACTED]
04/21/05	1.90	JB	work on production of client documents for document production and key documents
04/21/05	4.00	SWL	work on preparing/processing documents for document